

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

JEWISH FEDERATION OF LINCOLN)	Case No. 4:18-cv-3048
INC, A Nebraska Non-Profit)	
Corporation)	
)	
Plaintiff,)	COMPLAINT & PRAECIPE
)	
vs.)	
)	
JENNIFER ROSENBLATT,)	
)	
Defendant.)	
)	

Preliminary statement and allegations that apply to all counts:

1. The plaintiff, Jewish Federation of Lincoln, Inc., (JFL) is a non-profit corporation incorporated in the State of Nebraska and doing business in Lincoln Nebraska. Its processor organization was established in the late 19th century to collect charitable funds to assist educational and other philanthropic causes and to assist emigrants from Eastern Europe and other locations. It collects money from donors to distribute for philanthropic causes, such as a religious school and summer camp scholarships.

2. The defendant, Jennifer Rosenblatt, is a resident of the State of Kansas. Defendant moved to Lincoln sometime prior to 2010. She became active in community activities and in January of 2009 volunteered to act as treasurer and was appointed to be treasure of the plaintiff, with the responsibility of receiving and disbursing all funds collected by JFL. Defendant had a fiduciary obligation to act in accordance with her responsibilities as treasurer.

3. Commencing in March 2010, defendant began to intentionally and fraudulently convert and embezzle funds of the plaintiff for her own personal use and fraudulently concealed her activities. On a continuous and ongoing basis, from approximately March, 2010 to October 7, 2016, defendant converted and embezzled funds from the plaintiff in excess of \$100,000.00. Said conduct was not discovered until 2018, after defendant ceased being treasurer and had left the state.

4. The conduct alleged in this action occurred in the State of Nebraska.

5. This court has jurisdiction on the basis of diversity of citizenship; the plaintiff is resident of the State of Nebraska and the defendant a resident of the State of Kansas and the amount of controversy is in excess of \$75,000.00, exclusive of costs.

COUNT I

6. The defendant breached her fiduciary duty to the plaintiff and converted and embezzled money from the plaintiff's funds over which she had control, and used said funds for her own purposes.

7. Plaintiff was damaged in excess of \$100,000.00

COUNT II

8. The defendant fraudulently transferred and converted money belonging to the plaintiff for her own purposes.

9. Plaintiff was damaged in excess of \$100,000.00.

COUNT III

10. The defendant embezzled funds from the plaintiff and plaintiff is entitled to a full accounting of the amount of funds converted by defendant from plaintiff and other equitable relief.

WHEREFORE, plaintiff prays for judgment for an accounting of all funds converted by defendant, from plaintiff, and for judgment against defendant in the amount of damages for the amount the court determines was taken by defendant from plaintiff, and other further relief that the court deems just and equitable, and interest and costs.

JEWISH FEDERATION OF LINCOLN
INC, Plaintiff

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PRAECIPE

TO CLERK OF SAID COURT:

Please issue summons to defendant:

Jennifer Rosenblatt

Service will be made by personal service.

/s/Herbert J. Friedman
Attorney for Plaintiff